

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

BRANDI LITTLE,	:	
	:	
Plaintiff,	:	Case No.: 5:23-cv-02227-SL
	:	
v.	:	Judge: SARA LIOI
	:	
BLUE STREAM REHAB AND	:	
NURSLING LLC, et al.,	:	
	:	
Defendant.	:	

**DEFENDANTS’ UNOPPOSED MOTION FOR AN EXTENSION OF TIME
TIME TO MOVE OR PLEAD IN RESPONSE TO PLAINTIFF’S COMPLAINT**

Defendants Blue Stream Rehab and Nursing LLC, Mendel Brecher, and Dawn Nelson (all defendants collectively known as “Defendants”), by and through counsel, respectfully move for an extension of time to move or plead in response to the complaint (the “Complaint”) filed by Brandi Little (“Plaintiff”) until Wednesday, January 3, 2023. Defendants’ counsel has been in communication with Plaintiff’s counsel and Plaintiff has agreed to this extension.

Based on the agreement of the Parties this Motion should be granted. This is Defendants’ first extension. The Motion is brought in good faith, and this brief extension of time will permit Defendants to fully investigate the Complaint and assist the Parties in narrowing the issues for this Court to decide. Accordingly, Defendants’ Motion should be granted, and Defendants should be given until January 3, 2023, to move or plead in response to Plaintiff’s Complaint.

Respectfully submitted,

/s/ David A. Campbell

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Attorneys for Defendants

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 19th day of December, 2023 a copy of the foregoing was filed with the Court and served via electronic mail upon the following:

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Attorney for Plaintiff

/s/ David A. Campbell
David A. Campbell (0066494)
One of the Attorneys for Defendants